

**REMARKS**

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

**Disposition of Claims**

Claims 24-48 are currently pending. Claims 24, 40, and 45 are independent. The remaining claims depend, directly or indirectly, from claims 24, 40, and 45.

**Claim Amendments**

Independent claims 24 and 45 are amended for purposes of clarification. No new matter is added by way of these amendments, as support may be found, for example, at least in paragraphs [0075] and Figure 4 of the Specification as filed.

**Allowable Subject Matter**

Applicant thanks the Examiner for indicating that claims 25-39 and 48 contain allowable subject matter and for indicating that claims 40-44 are allowable. As discussed below, base independent claims 24 and 45 are believed allowable. Thus, rewriting claims 25-39 and 48 in independent form is deferred at this time.

**Rejection(s) under 35 U.S.C. § 103(a)**

Claims 24 and 45-47 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 4,342,906 ("Hyatt"). To the extent that this rejection may still apply to the amended claims, this rejection is respectfully traversed.

The claimed invention relates to driving a liquid filled lens using voltage. Accordingly, the amended independent claims require, in part, that the drive signal generation unit generates a low level differential waveform that is then *amplified to a high voltage level*. That is, amplification of voltage is used to drive the liquid filled lens in the claimed invention.

In contrast to the claimed invention, Hyatt relates to an illumination control system comprising an illumination amplifier such as a liquid crystal device that allows controlling, and especially amplifying, an illumination emitted by an illumination source. See Hyatt, Abstract, and system for amplification of light as shown in Figure 1 and described in col. 5, ll. 23-68, and col. 6, ll. 1-21. Thus, Applicant asserts that Hyatt is completely unrelated to the claimed invention, as Hyatt is clearly concerned only with amplification of light, and the present claims are directed toward amplification of voltage for the purpose of driving a liquid-filled lens.

Turning to the rejection, Hyatt fails to show or suggest a driver comprising (i) a high voltage generation unit for generating high voltage; and (ii) a drive signal generation unit for generating a final drive signal for the liquid-filled lens by generating a low level differential waveform (for driving the liquid-filled lens) and amplifying the low level differential waveform to a high voltage level generated by the high voltage generation unit, as required by amended independent claims 24 and 45. In fact, it follows from the fact that the only amplification to which Hyatt refers to is the amplification of the illumination, that Hyatt would have no need for a high voltage generation unit for generating a high voltage. Hyatt *does not manipulate voltage to drive a liquid filled lens*, and therefore, has no need to amplify voltage from a low level differential waveform to a high voltage level.

The Examiner cites col. 11, ll. 1-21 of Hyatt as teaching the aforementioned limitations required by (i) and (ii). In fact, this is the only section of Hyatt that even mentions voltage.

However, the cited portion of Hyatt refers to the generation of a pulse width modulated output signal (236) using a ramp amplitude (*see* Hyatt, 244, figure 2D) and two input signals (245, 246). While the input signals (245, 246) are described as analog voltage levels, Hyatt does not amplify these voltage levels, nor does Hyatt show or suggest amplifying a low level differential waveform to a high voltage level generated by a high voltage generation unit. Pulse-width modulation is a well-known concept in the art, which involves the modulation of a duty cycle of a signal or waveform, resulting in the variation of the average value of the signal. There is no amplification of a low level differential voltage waveform to a high voltage level involved in pulse-width modulation of a waveform.

In view of the above, it is clear that the Examiner's contentions fail to support an obviousness rejection of amended independent claims 24 and 45. Pending dependent claims are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

**Conclusion**

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number [17187/025001]).

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Respectfully submitted,

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